

238887 BK
**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE: § **CASE NO. 10-52450**
Dennis Leon Bullock §
§
§
§
DEBTOR(S) § **CHAPTER 13**

OBJECTION TO PROOF OF CLAIM OF SYLVIA S. ROMO, C.P.A.

NOTICE OF OPPORTUNITY FOR HEARING

NO HEARING WILL BE CONDUCTED ON THIS OBJECTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED ON THE PARTY FILING THIS OBJECTION TO CLAIM WITHIN TWENTY-ONE DAYS FROM THE DATE OF SERVICE HEREOF, UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH REQUEST FOR HEARING. IF NO RESPONSE IS TIMELY SERVED AND FILED, THE OBJECTION TO CLAIM SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING ON NOT LESS THAN THIRTY DAYS NOTICE.

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now, Debtor (so denominated whether individual or joint), and files this, Objection to Proof of Claim, and as grounds therefore would show as follows:

I.

- 1.1 This Objection is made pursuant to 11 U.S.C. § 502 and Bankruptcy Rule 3007.
- 1.2 On or about July 20, 2010, SYLVIA S. ROMO, C.P.A., a creditor, filed its claim herein. Debtor objects to this proof of claim on the grounds that Debtor will pay the 2010 property taxes direct outside the Chapter 13 Plan when they become due.

II.

Debtor requests, for reasons stated above, this claim be stricken in its entirety.

PRAYER

Wherefore, premises considered, Debtor requests this Court enter an order striking the objectionable claim as above described and providing such other and further relief to which Debtor may be entitled.

Respectfully submitted,

DAVIS LAW FIRM
909 N.E. Loop 410, Ste. 100
San Antonio, Texas 78209
(210) 826-6446
(210) 870-1539 FAX

By: _____

~~Chance M. McGhee
State Bar No 00791226~~
~~James E. Bailey, III
State Bar No. 01524990~~
~~Joseph W. Shulter
State Bar No. 18322800~~

Attorney for Debtor(s)

CERTIFICATE OF SERVICE

I certify that on 9-23, 2010, a copy of this document was mailed by first class mail, electronic notice and/or hand delivered to:

Dennis Leon Bullock
1824 E. Crockett St.
San Antonio, Texas 78202

Linebarger, Goggan, et.al.
711 Navarro, Ste. 300
San Antonio, Texas 78205

Sylvia S. Romo, C.P.A.
Bexar Co. Assessor/Collector
P.O. Box 839950
San Antonio, TX 78283-3950

United States Trustee
Western District of Texas
P.O. Box 1539
San Antonio, Texas 78295-1539

Chapter 13 Trustee
909 NE Loop 410, Ste. 400
San Antonio, Texas 78209

Chance M. McGhee
James E. Bailey, III
Joseph W. Shulter